

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STMICROELECTRONICS, INC.,	§	
	§	
	§	
Movant,	§	
	§	MISC. ACTION NO. _____
v.	§	
	§	Related Case No. 3:15-mc-00095-D-BF
SAMSUNG ELECTRONICS	§	
CO., LTD &	§	
SAMSUNG ELECTRONICS	§	
AMERICA, INC.	§	
	§	
Respondents.	§	

**STMICROELECTRONICS, INC.’S MOTION
FOR PROTECTION REGARDING SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS AMERICA, INC.’S SUBPOENA**

Based upon the accompanying Memorandum of Law and Appendix, STMicroelectronics, Inc. (“ST”) hereby requests this Court (1) sustain ST’s objections to the subpoena filed upon it by Samsung Electronics Co., LTD & Samsung Electronics America, Inc. (together, “Samsung”); (2) order Samsung to identify a manageable list of products for which it seeks technical documentation from ST; (3) order Samsung to reveal the list of companies for which it asks ST to search for licensing agreements; (4) issue an order finding that upon production of nonprivileged, responsive documents in ST’s care, custody, or control related to the aforementioned categories of information, that ST has fully complied with its discovery obligations; and (5) award ST any other, further or additional relief to which it may be justly entitled.

DATED: November 23, 2015

Respectfully submitted,

THE ORTIZ LAW FIRM

s/Giana Ortiz

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